

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

DHL GLOBAL FORWARDING (THAILAND)
LIMITED; DHL GLOBAL FORWARDING; DSV AIR
& SEA LTD.; DSV AIR & SEA INC. d/b/a DSV
OCEAN TRANSPORT and PYRAMID LINES LTD.

Plaintiff

Case Number

vs.

1:21-CV-10598

VANGUARD LOGISTICS SERVICES
(HONG KONG) LTD. and VANGUARD
LOGISTICS SERVICES

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)
MSIG MINTAI INS. CO., LTD., FUBON
INS. CO., LTD., TAIWAN FIRE & MARINE
INS., CO., LTD., and CATHAY CENTURY INS., CO.,
LTD., a/s/o Wistron Corp. and/or Wistron inforcomm
Technology (America) Corp.

Plaintiff

Case Number

vs.

21-CV-7994 (AT)

Danmar Lines Ltd. a/k/a Danmar Lines AG

Defendant

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

Case opened on 9/24/21; Summons Issued on 9/30/21 (Dkt. #8); defendant has not yet answered; deadline to submit pretrial joint letter and proposed case management plan adjourned to 30 days after service is completed (dkt. #4)

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Both cases involve the same voyage of the vessel ONE APUS and the same maritime casualty in which, while en route to the United States, approximately 2000 shipping containers were lost overboard and many others remaining on board were damaged.

The defendants in both cases are carriers and/or non-vessel operating common carriers who issued bills of lading for the carriage of cargo aboard the ONE APUS.

It is anticipated that numerous cargo interests will file actions in this District arising out of the ONE APUS casualty. It is respectfully submitted that assignment to a single judge will promote efficiency and will allow discovery to proceed under a unified schedule.

The following actions have already been accepted as related cases: 21-cv-9195; 21-cv-9546; 21-cv-9388; 21-cv-9370; 21-cv-9194; 21-cv-9638; 21-cv-10344; 21-cv-9858; 21-cv-10113; 21-cv-10177; 21-cv-10183; and 21-cv-9980.

Signature: /s/ Peter Skoufalos

Date: 12/13/2021

Firm: BROWN GAVALAS & FROMM LLP